

**COMMENTS OF CLEAN POWER NOW
ADVANCED NOTICE OF PROPOSED RULEMAKING
Alternate Energy-Related Uses of the Outer Continental Shelf
Department of Interior
Minerals Management Service
Regulation Identification Number (RIN) 1010-AD30**

Submitted electronically through www.ocsconnect.mms.gov
Project ID REG-HQ-0024

February 28, 2006

Clean Power Now is pleased to submit these comments on the Advanced Notice of Proposed Rulemaking regarding Alternative Energy-Related Uses of the Outer Continental Shelf issued by the Department of Interior, Minerals Management Service (MMS). Clean Power Now is a renewable energy advocacy organization based in Hyannis, Massachusetts, with over 5,500 members. Our comments are rooted in our belief that renewable energy projects will help bring about a clean, healthy environment, improved economy, and a more secure, sustainable America.

The US Department of Energy has estimated that over 900,000 megawatts of offshore wind power is available to be developed in the United States. This represents approximately the total demand for electricity in our nation. Offshore wind energy has the potential to help transform our nation's production by providing significant quantities of renewable energy. Under the Energy Policy Act of 2005, the MMS has been given jurisdiction over making this potential a reality.

Based on our experience as citizen advocates for the Cape Wind project, the nation's first offshore wind proposal, we believe it is crucial to inform and engage the public as early as possible in the project development and permitting process. To that end, we recommend that a potential applicant submit a public outreach plan as part of an initial application. This plan should identify local stakeholders and means through which the applicant will provide information and receive feedback. While this represents an additional up-front cost to developing an offshore project, in the long run it may result in significantly reduced development costs due to avoided delays.

The federal register notice specifically asked for input on structuring competitive bidding processes. Clean Power Now believes that the benefits of a renewable energy project, including the economic benefits, should be directed toward local residents to the greatest degree possible. We suggest that one means of measuring competitive bids for an offshore renewable energy project is to require the applicant to provide a cost structure for a long-term fixed price power supply contract which will be made available to local residents. Making the benefits of a renewable energy project tangible to local residents

helps ensure ongoing public support for the proposed project, and increases the likelihood of local support for future projects.

In developing comprehensive regulations governing offshore alternative energy development, MMS is faced with determining whether potential sites should be pre-selected, with areas identified as acceptable and others unacceptable, or if evaluation should be done on a case-by-case basis. Obviously, there are varying degrees between the two extremes and potential advantages and disadvantages with each. The pre-selection approach could potentially ease the process of site identification for developers, but could possibly preclude many potentially valuable sites. The case-by-case approach forces developers to do more site evaluation work, but increases the number of potential sites overall. In the opinion of Clean Power Now, at this early stage of offshore alternative energy development, the best interests of the public would be better served by the case-by-case approach. As new technology develops and we gain experience applying existing technologies, it is important to have as many potential sites available as possible. A site that might not be considered viable today may become viable as technology advances in the future.

We also recommend that MMS establish a time period, such as five years, for review of the regulations in light of potential technological advances.

Thank you for considering our comments. Please do not hesitate to contact us with any questions regarding our submission.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew A. Palmer". The signature is fluid and cursive, with the first name "Matthew" being more prominent than the last name "Palmer".

Matthew A. Palmer, PE
Executive Director
Clean Power Now
297 North Street
Suite 322A
Hyannis, MA 02601
Phone: (508) 775-7796
Fax: (508) 775-7782
mpalmer@cleanpowernow.org